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Counsel for Defendant ANDERSON

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIAN ANDERSON,

Defendant.

No. CR 15-00520 JSW

**APPLICATION FOR ORDER  
ALLOWING BRIAN ANDERSON TO  
TRAVEL TO U.C.S.F. FOR EXPERT  
EVALUATION AND [PROPOSED]  
ORDER**

Defendant, by and through his counsel, Assistant Federal Public Defender Ned Smock, hereby seeks an order from the Court permitting him to leave New Bridge Foundation inpatient treatment facility to attend an appointment with a mental health expert retained by the defense.

In further support of this Application, counsel states as follows:

1. Defense counsel has determined that it is in Mr. Anderson's best interest to participate in a psychological evaluation. The defense has retained a mental health expert who needs to perform an evaluation of Mr. Anderson at her office.

2. Mr. Anderson has been receiving drug treatment at the New Bridge Foundation in Berkeley for four months. Mr. Anderson would need to be away from the facility for no more than five to six hours including travel time. The defense has arranged for Mr. Anderson's father, who is a

1 surety in this matter, to escort him to and from the appointment.

2 3. Mr. Anderson's pretrial officer, Gelareh Farahmand, has indicated that she has no  
3 objection to this request. The defense will provide Ms. Farahmand all details regarding the timing  
4 and location of the evaluation beforehand.

5 4. The defense has informed counsel for the United States, Michelle Kane, of this  
6 request and she has indicated that the government has no objection.

7  
8 WHEREFORE, defendant, BRIAN ANDERSON, through his counsel prays that an order  
9 issue permitting him to leave New Bridge Foundation to be escorted by his father directly to and  
10 from an appointment with the defense mental health expert at University of California San  
11 Francisco.

12  
13 Dated: April 15, 2016

14 Respectfully submitted,

15 STEVEN G. KALAR  
16 Federal Public Defender

17 /s/ Ned Smock

18 NED SMOCK  
19 Assistant Federal Public Defender

20 **[PROPOSED] ORDER**

21 Good cause appearing therefor, IT IS HEREBY ORDERED that defendant Brian Anderson  
22 is permitted to leave New Bridge Foundation to be escorted by his father directly to and from an  
23 appointment with the defense mental health expert at University of California San Francisco.

24  
25 Dated: April \_\_, 2016

26 \_\_\_\_\_  
HON. DONNA M. RYU  
United States Magistrate Judge